

VIA UPS

Eric F. Pastor  
Pastor, Behling & Wheeler, LLC  
2201 Double Creek Drive, Suite 4004  
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas  
Unilateral Administrative Order, CERCLA Docket No. 06-05-05A  
Draft Feasibility Study

Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated April 14, 2011. With this letter, the EPA approves the Feasibility Study (FS) with the following modifications:

1. (Executive Summary, p. 1): The FS includes remedial action objectives of verifying continued plume stability, and protection against unacceptable indoor air exposures. The remedial actions objectives shall also include preventing land use other than commercial/industrial, and preventing use of ground water at the site.
2. (Executive Summary, p. 1): The components of Alternative 2 shall also include modification of the existing institutional controls (to identify type and location of hazardous substances), and implementing an Operation and Maintenance Plan to provide for ground water monitoring and inspection/repair of the cap over the former impoundments. Further, Alternative 2 shall include provisions for evaluating the continued stability of the ground water plumes, and as necessary an evaluation of additional measures to address the remedial action objectives. This evaluation will be completed on an annual basis, and as a part of the five-year reviews for the site.
3. (Executive Summary, p. 2): Alternative 3 shall also include operation and maintenance of the cap over the former impoundments.
4. (Executive Summary, p. 2): In the last paragraph, the term "ARAR" shall be "ARARs".
5. (Section 1.1.2, p. 6): The Remedial Investigation has now been approved, and the text shall be revised to indicate this.
6. (Section 1.2.3, p. 8): The sentence "Since preparation and implementation of such a cap operation and maintenance program are Site maintenance issues and not remedial

activities, the cap repair and plan preparation work is not considered in the development and evaluation of remedial alternatives herein” shall be deleted.

7. (Section 1.2.3, p. 9): The FS states that the extent of chemicals of interest was determined by comparison to extent comparison criteria. The FS shall include a brief summary of what the extent comparison criteria are.
8. (Section 1.2.3, p. 12): The FS describes the contamination for a number of areas/media, for example: wetland sediments; wetland surface water, pond sediment, etc. For some of these areas, but not all, a statement regarding the risk assessment conclusion for that area is provided. While the findings of the risk assessments are summarized later in the FS, a brief summary of the risk assessment findings shall also be included for each of the areas/media not already included.
9. (Section 4.2.2.1, p. 34): The FS proposes to use a Mann-Kendall or similar analysis to assess whether the chemicals of interest are above their respective extent evaluation criteria. The statistical analysis shall be performed in accordance with the EPA guidance “Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance”, March 2009.
10. (Appendix A, Applicable or Relevant and Appropriate Requirements): The Gulfco Site is adjacent to the Intracoastal Waterway, and this portion of the Intracoastal Waterway is a tidal water body. A tidal water body is by definition deemed to be a sustainable fishery [30 TAC §307.3(a)(67)]. Therefore, surface water concentrations in the Intracoastal Waterway adjacent to the Site shall meet the fish-only criteria for human health as specified in the Texas Surface Water Quality Standards (TSWQS) [30 TAC §307.6(d)(2)(B)].

These modifications shall be incorporated in the referenced document and copies provided to the notification list within 15 days of receipt of this letter. If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to [miller.garyg@epa.gov](mailto:miller.garyg@epa.gov).

Sincerely yours,

Gary Miller, P.E.  
Remedial Project Manager

cc: Luda Voskov (TCEQ)

millers: 5/23/11: L:\Superfund\oversight\gulfco feasibility study approval with mods 5-23-2011

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